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Telebrands Corp.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TELEBRANDS CORP.,

Plaintiff

v.

HENGSHUISHIBAIHUAJIANZHUGONGCH
ENGCHU d/b/a
GUODAOYUHEGANGLUJIAOCHA,
LINFENHAOKUNHUIWUFUWUYOUXIAN
ZERENGONGSI d/b/a
LIGUOHONGGONGSI,
SHANGQIUNONGLAINONGWANGNONG
YEKEJIYOUXIANGONGSI d/b/a
NONGLAINONGWANG,
YONGJIGULANSHANGMAOYOUXIANGO
NGSI d/b/a ZHAOBAICUNDIERZU,
ZHENGZHOUSHIERQIQUKEHANDIANZIC
HANPINSHANGHANG d/b/a
KEHANDIANZIXIAOMING, and
ZHENGZHOUSHIJINSHUIQUZHUNLUBAI
HUOSHANGHANG d/b/a UFPVSC,

Defendants

CIVIL ACTION NO.
25-cv-3131-AT

**MOTION TO EXCEED WORD
LIMIT OF PLAINTIFF'S
MEMORANDUM OF LAW IN
SUPPORT OF PLAINTIFF'S *EX
PARTE* APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER; ORDER RESTRAINING
DEFENDANTS' MERCHANT
STOREFRONT; AN ORDER TO
SHOW CAUSE WHY A
PRELIMINARY INJUNCTION
SHOULD NOT ISSUE; ORDER
AUTHORIZING BIFURCATED AND
ALTERNATIVE SERVICE; AND
ORDER AUTHORIZING
EXPEDITED DISCOVERY**

FILED UNDER SEAL

Plaintiff Telebrands Corp., (“Telebrands” or “Plaintiff”) hereby moves for an order granting Plaintiff permission to file a memorandum of law in excess of the word limitations set by the Court in support of Plaintiff’s *ex parte* application for: a temporary restraining order; an order restraining defendants' merchant storefronts, an order to show cause why a preliminary injunction should not issue; an order authorizing bifurcated and alternative service; and an order authorizing expedited discovery against Defendant in light of Defendant’s intentional and willful offerings for sale and/or sales of infringing products (“Application”), which is being filed herewith.


Pursuant to S.D.N.Y. Local Civil Rule 7.1(c), a memorandum of law filed in support of a motion may not exceed 8,750 words. Plaintiff’s Memorandum of Law filed in support of its Application, however, is 12,713 words, which Plaintiff believes is a necessary length to adequately address the complex legal and factual issues raised by its Application, particularly those concerning service of process on Defendants located in China.

Accordingly, Plaintiff respectfully requests that the Court grant this motion allowing Plaintiff to submit a memorandum of law in support of its Application which exceeds the requirements of Local Civil Rule 7.1(c).

GRANTED.

SO ORDERED.

Dated: April 21, 2025
New York, New York



ANALISA TORRES
United States District Judge